



The Demand for a Sea Service Strategy to Counter Illegal, Unregulated and Unreported Fishing

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About the Center for Maritime Strategy

The Center for Maritime Strategy (CMS) is a non-profit, non-partisan think tank and research institution dedicated to studying maritime issues and their context within wider American national security policy. Through its research and analysis, external outreach, publications, and high-level events, CMS engages key stakeholders across government, academia, and industry.

Our mission is to strengthen American national security through its sea services, conducting policy-driven research, advocacy, and education on the relationship between maritime power and national security policy.

Founded in January 2022, the Center supports all of the Nation's sea services, including the Navy, Marine Corps, Coast Guard, and Merchant Marine, through conducting scholarly research and analysis to drive prudent national security policies. Its inception came in response to several key national security challenges that demand revitalized maritime power:

1. The re-emergence of strategic competition with China and Russia.
2. The decline of the American maritime industrial base.
3. The expense and complexity of maritime platforms and systems which necessitates judicious foresight and long-term force planning.
4. Ever-increasing globalization driven by maritime highways and expanding sea-based infrastructure.
5. The difficulty of achieving political consensus on Capitol Hill in an era of heightened partisan polarization.

The Navy League of the United States sponsors the Center for Maritime Strategy, furnishing operational support and leveraging its 120-year history of supporting the American sea services with nearly 200 local chapters throughout the globe.

About the Moderator

Dr. Ian Ralby, a non-resident senior fellow with the Center for Maritime Strategy, served as the moderator for the conversations culminating in this report.

Dr. Ian Ralby is a globally recognized expert in six main areas: 1) maritime law and security, especially identifying and addressing evolving threats; 2) maritime domain awareness and the leveraging of different technologies and data sources for analyzing the maritime space; 3) maritime strategy that integrates security, governance and the maritime economy; 4) recognizing and countering resource-related crimes; 5) regulating, governing, and overseeing private security companies; and 6) certain aspects of international law including the legal regimes around floating armories, protection of submarine cables and the use of force by armed contractors. He is founder and CEO of I.R. Consilium, a family firm that provides leading advice and assistance on maritime and resource security, as well as a Senior Fellow at the Global Energy Center of the Atlantic Council and an Adjunct or Affiliate of several institutions including the US Naval War College, the Defense Institute of International Legal Studies, and the Institute for Security Governance. He previously spent 6 years as an Adjunct Professor of Maritime Law and Security at the US Department of Defense's Africa Center for Strategic Studies, and 5 years as a Maritime Crime Expert for the United Nations Office on Drugs and Crime's Global Maritime Crime Program.

Having worked in more than 85 different countries, Dr. Ralby maintains close relationships with leading professionals around the world in a variety of different disciplines. He continues to serve as an expert advisor to and consultant for various government agencies, international organizations, and private sector entities. He earned a B.A. in Modern Languages and Linguistics and an M.A. in Intercultural Communication from the University of Maryland, Baltimore County; a J.D. at William and Mary; and both an M.Phil. in International Relations and a Ph.D. in Politics and International Studies at the University of Cambridge.

Executive Summary

Illegal, Unreported, and Unregulated Fishing (IUUF) is a global maritime security problem that affects both large and small nations. It is a growing source of destabilization in many maritime areas of the globe, a source of significant national resources loss by many developing states, and a potential flashpoint for conflict between states, including major powers. Furthermore, the fishing fleets of some states are being used for purposes beyond fishing, supporting intelligence gathering, hybrid aggression, anti-submarine warfare, aggressive territorial claims against other states' territory, and engaging in trafficking to fund cartels, terrorist groups and nefarious state actors alike. The United States Coast Guard estimates that one half of the world's population relies on fish for 20 percent of more of their protein intake.¹ The United Nations Food and Agriculture Organization (FAO) reported that in 2022, "One in every five fish caught around the world every year is estimated to originate from IUUF, with devastating impacts on the sustainability of fisheries and the livelihoods of those who depend on them, as well as the conservation of marine ecosystems."²

While governments and non-profit organizations have discussed the IUUF problem in detail for years, the complexity of the national security challenges for the United States inherent in the vast undocumented harvesting of a key resource—often at the expense of U.S. partners and friends by known U.S. adversaries—demands a U.S. sea service and maritime interagency strategy for reporting and combating IUUF. That strategy should include the following key elements:

1. **Maritime Law Enforcement:** The United States Coast Guard has a critical role in the enforcement of fishery regulations within the U.S. exclusive economic zone, and in distant waters where aquatic products are harvested for eventual U.S. import. The National Oceanic and Atmospheric Administration (NOAA) is also actively engaged in fishing enforcement through its in-port inspection teams.³ Should they be the only sea service organizations actively engaged in countering IUUF?
2. **Surveillance and Intelligence Gathering:** The United States Navy surveillance and intelligence gathering efforts worldwide can be harnessed to identify, track, and localize those vessels engaged in IUUF along with other associated crimes such as forgery of fishing licenses, tax crimes, money laundering,

inappropriate working conditions, and forced participation (impressment) on fishing vessels.⁴ Once identified, these vessels can be reported to appropriate law enforcement authorities.

3. **Whole-of-Government Effort:** Monitoring and combatting IUUF are outside the scope of any one federal or state agency. A whole-of-government effort with international partnerships (similar to counter-narcotics commands such as Joint Interagency Task Force South/West) is needed to combat IUUF in multiple geographic locations.
4. **Capacity Building and Training:** One of the most important capabilities of the sea services is capacity building and training of allied, partner, and friendly nations' maritime services to meet the IUUF challenge both in their home waters and globally. The sea services have a long history of capacity building and training that can be leveraged in the campaign against IUUF. While many partner navies and coast guards are focused primarily or even exclusively on countering IUUF, institutional capacity building—to identify, address, and effectively penalize and deter IUUF—can substantially change the global operating environment.
5. **Joint Operations, Exercises, and Wargames Focused on IUUF:** Conducting joint and combined operations to combat IUUF and facilitated by a Joint and Combined task force enhances law enforcement actions and promotes information sharing within the wider IUUF community.
6. **International and Diplomatic Engagement:** Combatting IUUF is an international mission. Promoting multilateral and bilateral agreements that support sustainable fishing at the local and global level is the foundation of a stronger set of international regulations against IUUF.
7. **Public-Private Cooperation:** Given the extensive, extant scientific and philanthropic commitments to ocean sustainability and to new technologies that can help support it, the U.S. government should embrace the chance to collaborate with all actors willing and able to contribute to this multifaceted challenge and should ensure there is an adaptable forum for meaningful cooperative engagement.

Together, these measures represent the pillars of a future strategy to combat IUUF in an integrated campaign employing using the full spectrum of capabilities available from the U.S. government.

Project Overview and Design

In collaboration with the Center for Maritime Strategy (CMS) of the Navy League of the United States (NLUS), Airbus, a global corporation which manufactures a fleet of modern passenger airliners, generously sponsored a six-month series of seminars and webinars on the problem of Illegal, Unregulated, and Unreported Fishing (IUUF), culminating in a final session at the NLUS Sea-Air-Space Symposium at National Harbor, MD, in April 2024.

These seminars convened experts from government agencies, military organizations, private corporations, and non-governmental organizations (NGOs). The six seminars and the Sea-Air-Space Symposium discussed the following themes:

1. An Introduction to IUUF and Statement of the Problem with RADM Jo-Ann F. Burdian, Assistant Commandant for Response Policy, USCG and ADM James G. Foggo, USN (ret.), Dean of the Center for Maritime Strategy; moderated by Dr. Ian Ralby, I.R. Consilium.
2. Cross Cutting Tools for Countering IUUF with Dr. Curtis Bell, Professor of International Programs, U.S. Naval War College; moderated by Dr. Ian Ralby, I.R. Consilium.
3. Interagency Information and Intelligence Sharing with Mr. Taylor Wallace of Dataminr Corporation; moderated by Dr. Ian Ralby, I.R. Consilium.
4. Public-Private Cooperation with Mr. Tony Long of Global Fishing Watch; moderated by Dr. Ian Ralby, I.R. Consilium.
5. Building International and Partner Capacity with Dr. Sarah Glaser, World Wildlife Fund; moderated by Dr. Ian Ralby, I.R. Consilium.
6. Gaps in Policy Addressing IUUF with Dr. Whit Saumweber, Visiting Associate Professor of Marine Affairs at the University of Rhode Island and Senior Associate at the Center for Strategic and International Studies; moderated by Dr. Ian Ralby, I.R. Consilium.
7. Sea Air Space Symposium: Concluding Thoughts and the Call for An Integrated

Strategy to Combat IUUF with ADM James Foggo, USN (ret.), Dean of the Center for Maritime Strategy; RADM Jo-Ann Burdian, USCG; RADM Jack Vogt, USCG (ret.), Airbus, and Ms. Kim Murphy, Airbus; moderated by Dr. Ian Ralby, I.R. Consilium.

Participants

Throughout the seminars, a variety of personnel from U.S. government agencies, foreign embassies, think tanks, and NGOs participated in one or more of the sessions. Represented organizations include:

National Oceanic and Atmospheric Association
White House Council on Environmental Quality
Office of Management and Budget
Office of the U.S. Trade Representative
U.S. Department of Agriculture
U.S. Agency for International Development
U.S. Department of Labor
U.S. Federal Trade Commission
U.S. Food and Drug Administration
U.S. Department of State
U.S. Coast Guard
U.S. Department of the Navy
U.S. Department of Defense
U.S. Department of Homeland Security
U.S. Department of the Treasury
U.S. Fish and Wildlife Service
U.S. Immigration and Customs Enforcement
U.S. Department of the Interior
U.S. Department of Commerce
Center for Naval Analyses
World Wildlife Federation
Global Fishing Watch
Pew Research Institute
Navy League of the United States
American Academy of Diplomacy

Consideration of the Seven Pillars in the Future Development and Implementation of an IUUF Strategy

1. *Maritime Law Enforcement*

During the series, Dr. Ralby defined Illegal, Unreported, and Unregulated Fishing (IUUF) by breaking down each term into their constituent definitions. Illegal fishing is fundamentally about fishing that violates the law. Unreported fishing is when fishing is conducted—even legally—but not reported such that there is no ability to assess taxes, account for the volume of the catch, and maintain the sustainability of the seas. Unregulated fishing is where the activity happens in a legal or regulatory void, such that there is no applicable law, regulation, or conservation management tool and therefore no or limited ability to control the activity that is occurring.

Overall, IUUF is an enormous problem, and one seminar participant extended the impact of the problem beyond whole of government to the whole of humanity. In this context it would be appropriate for the United States and its allies to develop a robust law enforcement capability and presence to address the problem. Traditional law enforcement measures against IUUF have pitted global law enforcement agencies against primarily commercial fishing entities engaged in illegal or unsustainable activity, but in recent years IUUF has become another element of great power competition. Illicit fishing activity by Chinese fishing fleets, sometimes with the support and encouragement of the Chinese Coast Guard, substantially outpaces IUUF by other actors. In an October 2020 statement, former National Security Advisor Robert O'Brien announced, "The People's Republic of China's illegal, unreported, and unregulated fishing, and harassment of vessels operating in the exclusive economic zones of other countries in the Indo-Pacific, threatens our sovereignty, as well as the sovereignty of our Pacific neighbors and endangers regional stability."⁵

The United States Coast Guard (USCG) has as one of its missions: the requirement to combat IUUF not only in our own territorial waters and EEZ, but also in the waters of our allies and partners. The Coast Guard, however, is a small service with limited resources reporting to the Department of Homeland Security. The USCG has a fleet of roughly 250 coastal

and ocean-going cutters, patrol ships, buoy tenders, tugs, and icebreakers along with about 200 helicopters, manned by a total of 44,500 personnel.

Surprisingly, the U.S. Coast Guard has fewer personnel than the New York Police Department. There are simply not enough people or ships for the enormity of the task, and consideration should be given to grow the Coast Guard by at least 25 percent to address this and other priority missions of the service. One other possible solution would be to augment the Coast Guard in the performance of IUUF missions with assistance from U.S. Navy gray-hulled vessels. This course of action does not seem out of the question when viewed in the context of the actions of China's Distant Water Fishing Fleet, which one senior government official characterized as an "act of war!"

Voicing some concern over the migration of the Coast Guard's primary mission to the U.S. Navy, one senior U.S. Coast Guard officer opined that in dealing with illegal fishing conducted by Chinese or Russian fishing vessels, the Coast Guard is executing a "law enforcement mission". The insertion of U.S. Navy vessels in this mission set would invite an equivalent reaction from the other side, thereby escalating a law enforcement mission into something potentially more dangerous. Pacific Island partners have also noted that the presence of gray hulls is undesirable to them, particularly for those who are working to remain non-aligned, as U.S. Navy participation both escalates the tensions in their regions and invites China to send its own gray hulls as well. More work needs to be done to determine the right size of the U.S. Coast Guard in order to perform its numerous missions and how much the United States can count on other government agencies (such as Customs and Border Protection or NOAA) as well as its allies and partners to cover down on places that the United States Coast Guard has neither the capacity nor the reach to attain.

Recommendation: Conduct an independent assessment (outside the Department of Homeland Security) of U.S. Coast Guard roles, missions, and functions and the appropriate level of resourcing for the service assuming an increased level of persistent responsibility for countering overseas IUUF.

2. *Surveillance and Intelligence Gathering*

Technology has dramatically changed the ability of states to engage in low-cost, effective monitoring and surveillance of the maritime domain for fisheries governance and enforcement. There are two primary tools in use. First and foremost are Vessel Monitoring

Systems (VMS) which specifically track the fleet licensed to fish in a state's waters. Additionally, Automatic Identification System (AIS) platforms allow for the tracking of fishing vessels over 500 gross tons or those of 300 gross tons that make international voyages. VMS is often seen as more dependable for fisheries, but AIS offers valuable insights as well. Additional data sources—like Radio Frequency Identification (RFID), Synthetic Aperture Radar (SAR), Electro Optical Imagery (EO), and feeds from different terrestrial, and aerial systems—all complement what has historically been limited to what was detectable on maritime patrols. Increasingly, there are both commercial and philanthropic actors who offer platforms for helping to analyze this data, as well as governmental systems. Indeed, entities like Global Fishing Watch have provided free tools for identifying IUUF using both AIS and VMS data. But competent human analysts are still needed to turn information into understanding and discern what analysis needs to be shared with which enforcement agencies.

The seminars included much discussion on the tradeoff between the assignment of maritime law enforcement assets against a growing group of mission sets including combatting illegal trafficking (of narcotics, weapons, humans, and other contraband), piracy, and IUUF activity. Deterring or intercepting narcotics trafficking into the United States is a national security issue that must be and is addressed by the Joint Interagency Task Force-South (JIATF-S) in Key West, Florida, among other agencies. JIATF-S is a tremendous success story involving multiple agencies in a coordinated effort to stem the tide of drug trafficking across our borders and provides a fantastic model of intelligence sharing for tackling an issue through a whole-of-government approach, paired with a multitude of liaison officers.

This model could be applied to IUUF both domestically and internationally. Furthermore, a 2023 Central Intelligence Agency (CIA) report states that IUUF has, “replaced piracy as the leading global maritime security threat,” and notes that identifying which ships are engaged in illegal activity is, “a needle-in-a-haystack problem.”⁶ Whereas the United States once had armadas of gray-hulled fleets conducting counter-piracy operations off the coast of East Africa, this problem has been resolved for the time being and the recurrence of piracy in East Africa or the Gulf of Guinea pales in comparison to the damage done by illegal fishing.

While military and other U.S. government satellite, air, surface ship, and submarine assets regularly gather

information of use in prosecuting IUUF, the fusion of this data, and its combination with civilian sources for a public/private partnership in combatting IUUF remains a challenge. Fusing U.S. data with that of allies, partners and friends is also necessary, and Airbus is leading the way with its support to numerous national collection efforts that highlight illegal fishing.⁷ Use of artificial intelligence (AI) to anticipate and gather intelligence on IUUF is also a promising new tool.

The Forum Fisheries Agency (FFA) in the Pacific presents an increasingly interesting model. For years, FFA has been the leading regional center for maritime domain awareness, analysis and information sharing regarding IUUF. Now with the added support of Joint Interagency Task Force-West (JIATF-W), the FFA is increasing its capacity in other fisheries-related aspects of maritime security, most notably fisheries crime. It is also leveraging an ever-wider set of tools for monitoring the vast ocean expanse of the Pacific.

Dr. Ralby argued that AI data fusion “is one of the few ways to harness and assimilate lots of different data sets. In fact, you can see what a vessel is doing and its history, not just its movement history, but who used to own it, who owns it now, where [the] owner [is] located, who the beneficial owner is, who the operators are, who used to be the operators, where [it was previously] flagged and what it used to be called.”⁸ Given the vast amounts of IUUF information collected by both governments and private industry, AI remains perhaps the best tool for fusing numerous sources together into predictive intelligence that could be used in deterrence or enforcement operations. It is something that should be optimized in our efforts to combat IUUF worldwide.

Recommendation: More work is required to determine creative methods to expand the reach and efficacy of counter-IUUF efforts by utilizing uncrewed systems, Artificial Intelligence, and multiple data sources for more accurate and efficient analysis.

3. Whole-of-Government Effort

While sea services can take a leading role in the surveillance, tracking, and interception of vessels engaged in IUUF, an interagency and international approach is needed to address IUUF and provide long-term answers for sustainable use of fishery resources. The 2019 Congressional SAFE Act established such a group effort in the 21-office interagency task force to combat IUUF. The National Oceanic and Atmospheric Agency (NOAA), was appointed to chair

this effort with the Department of State and Coast Guard as Deputy chairs.⁹

In 2022, the task force published an extensive strategy that recommends continued close cooperation with a number of nations including Senegal, Thailand, the Philippines, Indonesia, Taiwan, and Vietnam. It also recommends replicating “a recent Department of State Bureau of International Narcotics and Law Enforcement project in the Caribbean, Central America, and South America regions that provides baseline information on gaps in understanding around country law enforcement and legislative capacity on IUUF.”

The next step from this effort should be take inspiration from the 1990’s-era Joint Interagency Task Force (JIATF) East and today’s JIATF South and West, as well as the FFA to explore how to operationalize a whole-of-government approach most effectively to IUUF, as well as related offenses including fisheries crime. These organizations make extensive use of sea service assets as vehicles for intelligence collection, tracking, and apprehension of those engaged in criminal narcotics smuggling. Waterborne criminal activities are often related. As the IUUF strategy notes: “transnational organized illegal activity, including human trafficking and illegal trade in narcotics and arms that may be tied to IUUF”.¹⁰ Some of those trafficked become virtual slaves aboard vessels engaged in illegal fishing. The International Labor Organization estimated in 2021 that 128,000 people were effectively detained aboard fishing vessels as forced laborers, often, “in the high seas (seas beyond the territorial waters of any state) where workers are isolated, conditions are hazardous and there is little regulatory oversight.”¹¹

Central and South America have been especially hard-hit by IUUF in recent years: “...economic losses as high as US\$2.3 billion, income losses as high as \$600 million, and tax revenue losses of as much as \$500 million. Together, these figures suggest that, after Asia and Africa, South America is the region that suffers the biggest losses globally due to IUUF.”¹² A similar model of cooperation could be employed in AFRICOM and INDOPACOM to widen the global scope of cooperative counter IUUF efforts.

The Coast Guard made substantial progress on the IUUF issue in 2023, including by signing a memorandum of understanding with Global Fishing Watch, an international nonprofit organization focused on advancing ocean governance through transparency and by establishing an IUUF center of excellence on

Oahu in Hawaii.¹³ China saw it fit in 2023 to rein in some of its IUUF, first by accepting the World Trade Organization’s Agreement on Fisheries Subsidies, which protects against harmful subsidies, including for vessels engaged in IUUF, and also claimed to have leveled \$137 million in fines on those engaged in IUUF.¹⁴ International cooperation and enforcement can make a difference; illegally-harvested fish does not have the same shelf-life as other illicit substances such as illegal drugs, and therefore moved to market on a tighter timeline, making them more vulnerable to internationally-coordinated efforts.¹⁵

Recommendation: Conduct a feasibility study to determine the efficacy of forming a Joint Interagency Task Force on IUUF (JIATF-IUUF) to include the participation of multiple U.S. government agencies along with allies and partners that is patterned after the JIATF-S model discussed throughout this paper.

4. Capacity Building and Training

None of these internationally-coordinated efforts can occur without a common understanding of the challenge and shared operating procedures. Building the capacity of individual members of the counter-IUUF coalition is the first step toward more effective enforcement of regulations over a much wider area. Poorer nations—especially those without significant air/sea resources—need additional support. The U.S. Coast Guard already has 12 capacity partnership agreements with Pacific Island nations but is stretched thin with these and its other missions.

Capacity to detect and prosecute IUUF can be developed through aid packages with accompanying training for the ships, boats, coastal radar, AIS, and other gear needed to detect and track illegal fishing activity in the recipient nation’s exclusive economic zone. It could also be developed through the establishment of a joint/international interagency IUUF task force where larger and more capable nations could simultaneously work with and provide aid to smaller and/or less capable states seeking to reclaim control over their fishing resources.

The Africa Partnership Station (APS), discussed at length during the course of the six seminars, is one of the most successful programs to combat IUUF and illegal trafficking of other contraband, orchestrated by the Commander, U.S. Sixth Fleet and under the umbrella of AFRICOM since 2007. APS is based upon four basic pillars:

1. Develop Maritime Domain Awareness
2. Build Maritime Professionals

3. Establish Maritime Infrastructure
4. Develop response capabilities while building regional integration.

APS builds capacity through established relationships with all the signatories of the Yaoundé Code of Conduct in the Gulf of Guinea. APS has assisted these countries with eliminating “sea blindness” and promoted the economic benefits of protecting blue economies to regional nations. APS employs tools like the African Maritime Law Enforcement Program (AMLEP) which is responsible for training a generation of maritime fisheries patrols, coast guards, and navies in protecting and preserving their territorial waters and economic zones.

Likewise, once a year, the Sixth Fleet sponsors Exercise Obangame Express, the largest combined naval exercise in the Gulf of Guinea. Obangame Express grows in terms of numbers of participants and complexity every year. The progress made by individual nations conducting maritime domain awareness in 2007 compared to 2021 is stunning. APS is an exportable model that could be used in other countries or regions experiencing encroachment of their maritime economic zones by state or non-state actors.

While APS has been very successful, U.S. Navy or U.S. Coast Guard assets to participate in the mission are becoming increasingly scarce. Accordingly, the United States has pursued other efforts at building capacity by leveraging innovative programs and agreements rather than physical assets. One strategy used by the U.S. Coast Guard to help foreign partners build capacity for counting IUUF is through the Ship Rider Program. These bilateral efforts authorize a law enforcement official of one nation party to the agreement to embark on a law enforcement vessel or aircraft of another nation and exercise law enforcement missions. U.S. Ship Rider agreements are designed to allow U.S. law enforcement officials, typically U.S. Coast Guard law enforcement officials, to assist partner nations in combating various illicit maritime activity, such as IUUF.¹⁶ The Coast Guard currently maintains 15 such agreements with participating nations.

Recommendation: Explore opportunities to export the Africa Partnership Station model to other regions of the world plagued by IUUF. In light of diminishing asset availability, expand the USCG Ship Rider program to the ships of other interested sea services (U.S. Navy, Military Sealift Command, and NOAA) as well as cooperative foreign coast guards and navies.

5. Joint Operations, Exercises and Wargames

The natural steps from capacity building to action are (1) joint operations and (2) exercises where data collection, processing, and follow-on law enforcement action can be practiced to grow participants’ overall competence in countering IUUF. Exercises in particular are the logical point to include larger, outside actors like the U.S. Navy to assist in these efforts.

Likewise, there is a growing interest in the use of gaming to assess non-traditional problems that exist in the world. Games and simulations have taken on new importance in combatting threats in cyberspace, threats from uncrewed systems, or non-kinetic aspects of the global operating space. The Center for Maritime Strategy (CMS) is emerging as a major convenor in this growth industry. For the last two years at the Sea-Air-Space symposium in National Harbor, Maryland, CMS has curated a large seminar interested in traditional and non-traditional simulations and games. CMS has hosted an IUUF game created by the Center for Naval Analysis (CNA) and introduced the game to the senior leadership at the Naval War College and the Naval Postgraduate School. The IUUF game could be expanded and tailored to individual regions of the world and adopted by Fleet Commanders or Coast Guard Regional Commanders for the training of U.S., allied, and partner personnel.

Recommendation: Adopt the Obangame Express model for training of allies and partners in an effort to combat IUUF. Utilize IUUF games to supplement knowledge and training of personnel before embarking on real world missions to combat IUUF.

6. International and Diplomatic Engagement

International action through diplomatic engagement is the chief enabler of the exercises, games, and ultimate law enforcement activity to blunt IUUF. 2022 was a banner year for international agreements on IUUF. The World Trade Organization Agreement on Fisheries Subsidies, adopted on June 17, 2022, was designed to improve global fishery governance through trade measures.¹⁷ The United States is part of nearly a dozen international fisheries agreements as of 11 August 2023 in multiple world ocean regions.¹⁸

Despite these organized international efforts, the problem of IUUF remains significant. The United States Interagency Working Group on IUUF fishing last issued its strategy for combatting IUUF in 2022. That strategy’s tenets, notably its identification of six key partner states has helped to focus U.S. efforts,

especially in the Philippines where an expanded use of an IUUF threat assessment and index tool helps local communities fight illegal fishing.¹⁹ Diplomatic and international engagement also supports enforcement by more direct means. The United States and the UN Office on Drugs and Crime are partnering with Senegal to support judicial and prosecutorial capacity-building to identify and prosecute known illegal fishing activity. This effort also includes a vessel boarding training program with Senegalese in partnership with Interpol to enhance IUUF monitoring efforts.²⁰

Recommendation: Continue bilateral and multilateral efforts with nations affected by IUUF, and international organizations like the United Nations to improve the IUUF law enforcement, especially when it empowers local communities and affected nations to take back their fishing grounds.

7. Public/Private Partnerships

International and diplomatic engagement to combat IUUF can be expanded to include private entities with an interest in protecting national fisheries. Partnerships with legal international and local fishing industries can be productive vehicles to prevent illegal activity.

Some of these are direct government and private foundation collaborative efforts. One example of this is Por la Pesca, a public-private partnership in Peru and Ecuador backed by USAID and the Walton Family Foundation and implemented through the Peruvian Society of Environmental Law (SPDA). Por la Pesca helps organize and define the artisanal fisheries sector, by improving economic opportunities and best fishing practices in coastal communities. Por la Pesca has already shown tremendous success, registering 750 vessels in Peru, training more than 2,700 fishers, and helping pass six legal reforms that improve fisheries regulation since its startup in 2022.²¹

Other public/private partnerships use technological means or unconventional pairings to achieve outsized success. The Pew Charitable Trust Oversea Ocean Monitor and Global Fishing Watch's satellite-based platforms observe suspect fishing activity across significant spans of the ocean. Other contributor-based groups such as the Sea Shepherd Conservation Society and Greenpeace can aid in building maritime domain awareness through intelligence collecting and observation from the platforms (largely ships) crewed by their volunteers. These partnerships perhaps represent the future of IUUF prevention due to their distributive efforts and direct access to local communities most affected by IUUF.

Recommendation: Continue to support the development of public/private partnerships that involve local communities most affected by IUUF to improve maritime domain awareness of illegal fishing activities and empower communities and local/national law enforcement to address IUUF.

Conclusion

The foundations for global response to the growing problem of IUUF have been laid via a number of international, interagency, and private enterprise efforts since the beginning of the decade, but more effort is needed to better protect both local fisheries and the global fishing industry from predatory illegal activity. U.S. law enforcement efforts via the U.S. Coast Guard need regular assessment in order to improve Coast Guard capacity to enforce IUUF regulations and support less capable nations' maritime forces in that effort. Additional capacity for these efforts may come from uncrewed boats, aircraft, and even undersea vehicles, powered with AI-driven search algorithms to improve intelligence gathering, tracking and ultimately law enforcement against those engaged in IUUF.

Using the example of the counter-narcotics joint organizations, notably in their regional knowledge, local relationships, and interagency organization to combat IUUF. Gaming, training, and exercises such as those employed in West African operations can further improve operations against IUUF platforms. The U.S. Coast Guard is stretched thin by its multitude of operations, so enlisting other agencies, naval, and international partner sea services to support law enforcement shipriders can further combat illegal fishing activities. Continued and expanded bilateral and multilateral engagement, especially with those nations most affected by illegal fishing in their territorial seas can empower those states to take back their fishing stocks and protect them in the future.

Finally, the continued evolution of innovative public/private partnerships holds the promise for effective future enforcement, again through the empowerment of local communities and nations hard-hit by illegal fishing activity. Uncrewed systems, volunteer organizations and supportive international groups hold the key to future continued success against IUUF. The world's oceans hold the vast bulk of food sources for the planet and the continued maintenance of fishery resources is essential to global food security. Implementing these proposed recommendations will go a long way in preserving the ocean for future generations.

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- 2 “The global fight against illegal, unreported, and unregulated fishing reaches a new milestone,” Food and Agriculture Organization of the United Nations, July 11, 2022, <https://www.fao.org/newsroom/detail/the-global-fight-against-illegal-unreported-and-unregulated-fishing-reaches-a-new-milestone/ens>.
- 3 “NOAA Enforcement Continues the Fight against Illegal, Unreported, and Unregulated Fishing,” NOAA Fisheries, June 7, 2021, <https://www.fisheries.noaa.gov/feature-story/noaa-enforcement-continues-fight-against-illegal-unreported-and-unregulated-fishing>.
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- 5 “Statement from National Security Advisor Robert C. O’Brien,” The White House, October 23, 2020, <https://trump-whitehouse.archives.gov/briefings-statements/statement-national-security-advisor-robert-c-obrien-102320/>.
- 6 Peter C. Oleson, “Using Intelligence to Counter Illegal, Unreported, and Unregulated Fishing,” *Studies in Intelligence* 67, no. 1 (March 2023): 1-2.
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Center for Maritime Strategy

2300 Wilson Blvd Suite 200

Arlington, VA 22201

centerformaritimestrategy.org